

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	No. 23-CR-64
Plaintiff,	)	
	)	<b>INDICTMENT</b>
vs.	)	
	)	Count 1
MARGO ANN WILLIAMS,	)	18 U.S.C. § 1956(h):
Defendant.	)	Money Laundering Conspiracy

The Grand Jury charges:

**Count 1**  
**Money Laundering Conspiracy**

In about June 2023, in the Northern District of Iowa and elsewhere, defendant MARGO ANN WILLIAMS did knowingly combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1957(a), specifically,

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, Wire Fraud in violation of 18 U.S.C. § 1343, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial

transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity; and

(b) to knowingly engage and attempt to engage, in monetary transactions by, through or to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is Wire Fraud in violation of 18 U.S.C. § 1343, such property having been derived from a specified unlawful activity, that is, Wire Fraud in violation of 18 U.S.C. § 1343.

#### Manner and Means

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

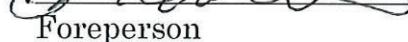
- (a) on or about June 6, 2023, receiving an interstate wire in the amount of \$466,066.97 in funds from a church located in Cedar Rapids, Linn County, Iowa, within the Northern District of Iowa, into an account ending in 7008 that defendant controlled in the corporate name of "MBCI & Evercorp LLC" at Bank-1 in Pennsylvania;
- (b) on or about June 6, 2023, and June 12, 2023, transferring \$263,000.00 and \$100,000.00, respectively, from the 7008 account to a personal checking account ending in 8724 that defendant controlled in her own name at Bank-1;
- (c) on or about June 6, 2023, wiring \$211,000 from the 8724 account to a personal checking account ending in 3398 that defendant controlled in her own name at Bank-2; and

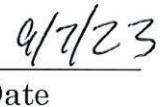
(d) between on or about June 14, 2023, and June 22, 2023, executing four outgoing wires, each in the amount of \$50,000, from the 3398 account to a bank account associated with a national cryptocurrency exchange and elsewhere.

This was in violation of Title 18, United States Code, Section 1956(h).

A TRUE BILL

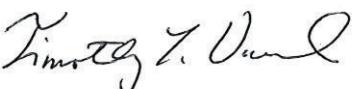
s/Foreperson

Foreperson

9/7/23

Date

TIMOTHY T. DUAX  
United States Attorney

By: 

TIMOTHY L. VAVRICEK  
Assistant United States Attorney

PRESENTED IN OPEN COURT  
BY THE  
FOREMAN OF THE GRAND JURY

And filed 9/8/23  
PAUL DE YOUNG, CLERK